

## REMARKS

This application has been reviewed in light of the Office Action dated November 26, 2008. Claims 2-4, 6-18, 39 and 40 are presented for examination, of which Claim 39 is in independent form. Claim 5 has been canceled and its features have been incorporated into Claim 39. Claim 40 has been added and incorporates features that were previously in Claim 39. Claims 2, 7, 9 and 39 have been amended to define Applicants' invention more clearly. Favorable reconsideration is respectfully requested.

The Office Action states that Claims 2-18 and 39 are rejected under § 103(a) as being unpatentable over U.S. Patent No. 6,070,142 (*McDonough et al.*) in view of U.S. Patent No. 6,014,645 (*Cunningham*) and further in view of U.S. Patent Application Publication No. 2001/0044840 (*Carleton*).

The aspect of the present invention set forth in Claim 39 is directed to an acquisition system, which could be applied to the financial services industry, for example. *See* Specification, para. [0003]. The acquisition system includes 1) a client interface for accepting client requests. *See* Fig. 2, 20. For example, a client request could be a request from a brokerage firm to open a brokerage account for a customer. The acquisition system also includes 2) a dispatcher for routing client requests. *See* Fig. 2, 110 and Specification, para. [0015].

In addition, the acquisition system includes 3) a plurality of client- or function-specific handlers for implementing appropriate business logic. *See* Fig. 2, 112. For example, a handler could be a system that manages the tasks for opening a brokerage account with the brokerage firm, including data capture, account setup and activation, and customer notification. The dispatcher routes each client request to an appropriate handler.

Furthermore, the acquisition system includes 4) a plurality of workers for accomplishing common tasks. *See* Fig. 2, 114. For example, a worker could be a system for data capture, saving a log entry consisting of a client ID, a request type, and a timestamp into a particular memory location. Each handler invokes one or more workers according to appropriate business logic, and multiple handlers could invoke the same worker to accomplish the same sort of tasks.

In this way, there is a clean separation between business logic and common tasks, which enables effective reuse of workers and easy addition (for a new client, for example) or change of business logic (para. [0016]). In general, a client may rely on existing workers. However, for increased efficiency, for example, a client may introduce new workers to increase the amount of resource available for accomplishing common tasks.

Yet another notable feature of Claim 39 is that a new worker utility is configured by either a corresponding client or one of the handler systems to be re-used by any of the clients. *See, e.g.,* Specification, para. [0016-0019].

Nothing has been found in *McDonough*, *Cunningham*, or *Carleton*, considered separately or in any permissible combination, that is believed to teach or suggest all the features of Claim 39. A detailed explanation supporting this assertion follows.

#### A Plurality of Handlers and A Plurality of Workers

Claim 39, as amended, recites “a dispatcher configured to route each of the plurality of event requests to at least one of a plurality of handler systems, each handler

system configured to invoke at least one of a plurality of worker utilities according to business logic for handling a respective event request, each worker utility configured to perform one or more tasks to fulfill the respective event request,... wherein... all of the plurality of handler systems are enabled to invoke any of the worker utilities”

The Office Action states that *McDonough* discloses these features.

Applicants respectfully disagree.

*McDonough* relates to a virtual customer and sales service center. As understood by Applicants, when a customer submits a request by phone, where the request is accepted by a voice response unit (VRU) (*see* Fig. 4, 440), via the internet (*see* Fig. 4, 430), etc., the request is sent to a context manager (*see* Fig. 4, 402), which passes the request to a service provider (*see* Fig. 4, 410), which analyzes the request and determines how to route the request to an appropriate resource to best handle the request.

The Office Action suggests that a VRU in *McDonough* corresponds to a handler of Claim 39 (top of page 4 of the Office Action). The Office Action further suggests that either the context manager invoking the functionality of address change or a service provider implementing this functionality in *McDonough* corresponds to a worker of Claim 39 (bottom of page 4 of the Office Action; *see* Fig. 7 and col. 10, line 61 through col. 11, line 9 of *McDonough*).

Applicants submit that a VRU does not correspond to a handler of Claim 39 at least because it does not perform business logic specific to a client or function and “invoke at least one of a plurality of worker utilities according to the business logic,” as recited in Claim 39. In addition, Applicants submit that even assuming that the context manager corresponded to a worker of Claim 39, there does not exist “a plurality of worker

utilities,” as recited in Claim 39. Similarly, Applicants submit that a service provider does not correspond to a worker of Claim 39 at least because it cannot be invoked by “all of the plurality of handler systems,” as recited in Claim 39.

Accordingly, *McDonough* is not believed to disclose or suggest a plurality of handlers and a plurality of workers of Claim 39. Even if *Cunningham* and *Carleton* are deemed to show all that they are cited for, such would not remedy the deficiency discussed above.

#### A Client Adding A Worker

Claim 39 also recites that “at least one of the plurality of clients is enabled to add a new worker utility.”

While conceding that this feature is not disclosed or suggested in *McDonough*, the Office Action states that it is in *Cunningham*. Applicants respectfully disagree.

*Cunningham* relates to a financial card application system (FCAS) . The Office Action states that a card server in *Cunningham* corresponds to a “worker” without specifying what would correspond to a “client,” as recited in Claim 39, which submits one or more event requests. As understood by Applicants, *Cunningham* does not discuss who and what would supply a card server to the FCAS but only when a card server would be added – depending on the total amount of transaction in the system (*see* col. 3, lines 46-52 of *Cunningham*, for example). It could very well be an administrator or manager of the FCAS who introduces a new card server, where such a person does not submit any event

request to the FCAS and thus would not correspond to the client of Claim 39. However, this is far from a client adding a new worker.

Moreover, Applicants have found nothing in *Cunningham*, that would teach, suggest or otherwise result in “wherein the new worker utility is configured by at least one of a corresponding client and one of the handler systems to be re-used by any one of the plurality of clients,” recited in Claim 39.

Accordingly, *Cunningham* is not believed to disclose or suggest a client adding a worker recited in Claim 39. Even if *Carleton* is deemed to show all that it is cited for, such would not remedy the deficiency discussed above.

Accordingly, Applicants submit that Claim 39 is patentable over the cited art, and respectfully request withdrawal of the rejection under 35 U.S.C. § 103(a).

A review of the other art of record has failed to reveal anything that, in Applicants’ opinion, would remedy the deficiencies of the art discussed above, as applied against amended claim 39. Therefore, Claim 39 is respectfully submitted to be patentable over the art of record.

The other rejected claims in this application depend from Claim 39 and, therefore, are submitted to be patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

No petition to extend the time for response to the Office Action is deemed necessary for this Amendment. If, however, such a petition is required to make this Amendment timely filed, then this paper should be considered such a petition and the Commissioner is authorized to charge the requisite petition fee to Deposit Account 50-3939.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

/Jonathan Berschadsky/  
Jonathan Berschadsky  
Attorney for Applicants  
Registration No. 46,551

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3801  
Facsimile: (212) 218-2100

FCHS\_WS 2692449\_2.DOC